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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO DEBTORS'
PRELIMINARY OPPOSITION TO GHOST
SHIP EXECUTIVE COMMITTEE'S MOTION
FOR RELIEF FROM THE AUTOMATIC
STAY**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: December 17, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court,
Courtroom 17, 16th Floor
450 Golden Gate Avenue,
San Francisco, CA 94102

Re: Docket No. 5093

1 The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter
2 11 cases of the above-captioned debtors-in-possession (collectively, the “Debtors”) hereby supports
3 and joins in the *Debtors’ Preliminary Opposition to Motion for Relief from Automatic Stay to Permit*
4 *the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Post Trial*
5 *Matters in Connection with the Ghost Ship Fire Cases* [Docket No. 5093] (the “Preliminary
6 Opposition”).¹ The Committee reserves all rights to be heard before the Court in connection with the
7 Motion (and any joinders thereto), to amend, supplement, or otherwise modify this Joinder prior to
8 or during the preliminary hearing on the Motion, and to assert such other and further objections prior
9 to the final adjudication of the matter.
10

11 WHEREFORE, for the reasons set forth in the Preliminary Opposition, the Committee
12 respectfully requests that the Court enter an order: (i) denying Movant’s request for relief from the
13 automatic stay at this time; and (ii) granting such other and further relief as is just and proper.

14 Dated: December 12, 2019

MILBANK LLP

/s/ Gregory A. Bray
DENNIS F. DUNNE
SAMUEL A. KHALIL
GREGORY A. BRAY
THOMAS R. KRELLER

*Counsel for the Official Committee of
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27 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Preliminary
28 Opposition.